



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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By ECF and By Email

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Re: United States v. Awais Chudhary
Criminal Docket No. 20-135 (CBA)

Dear Counsel:

The government writes to supplement its prior expert disclosure. As previously disclosed, the government expects to call Dr. Vidino to address various aspects of the Islamic State of Iraq and al-Sham ("ISIS"). See ECF No. 68 (Jan. 21, 2022). The government also provides here, via attachments, transcripts of Dr. Vidino's prior testimony and other materials, to include Dr. Vidino's testimony in United States v. Kandic, 17-CR-449 (NGG), pursuant to Title 18, United States Code, Section 3500. [3500-LV-2 – 12].

In the government's prior disclosure, the government explained that it expects Dr. Vidino will testify that ISIS's leadership promoted "lone wolf" attacks by ISIS supporters in Western countries. The government's prior disclosure also explained that it expected Dr. Vidino to testify that ISIS supporters followed ISIS's instructions and conducted "lone wolf" attacks in the United States and Europe. As noted previously, Dr. Vidino is expected to testify about specific "lone wolf" attacks in the United States and Europe, to include the December 2015 shooting in San Bernardino, California, at the Inland Regional Center; the June 2016 shooting in Orlando, Florida, at the Pulse nightclub; the July 2016 truck attack in Nice, France during Bastille Day celebrations; the December 2016 truck attack in Berlin, Germany at a Christmas market; and the May 2017 suicide bombing in Manchester, United Kingdom at a concert.

In testifying regarding these specific "lone wolf" attacks in the United States and Europe, Dr. Vidino is expected to discuss a description of the perpetrators, the type of

tactics and tools used to carry out the attack (e.g., using knives, explosives or vehicles), whether the perpetrators consumed ISIS propaganda online, whether the perpetrators pledged allegiance to ISIS, and whether there was an operational connection to ISIS. Dr. Vidino is also expected to testify that ISIS had “virtual planners” who used social media and encrypted online messaging platforms to connect to would-be attackers in Western countries and guided them through the execution of terrorist attacks. More specifically, Dr. Vidino’s expected testimony about the above-referenced attacks will include:

- *Garland, Texas* (May 3, 2015) – Elton Simpson and Nadir Soofi utilized firearms to commit a terrorist attack in Garland, Texas at a “Draw the Prophet Muhammad” event. Prior to the attack, Simpson was an active participant in the social media community of U.S.-based ISIS sympathizers and was connected to known ISIS supporters.
- *San Bernardino, California* (December 2, 2015) – Tashfeen Malik and Syed Rizwan Farook – who were married – committed the attack at an office party while armed with semiautomatic firearms and which resulted in 14 victims. The perpetrators were ISIS sympathizers who had consumed ISIS and other jihadist propaganda online. Although the perpetrators pledged their allegiance to ISIS online, the investigation revealed no operational connection to ISIS members.
- *Orlando, Florida* (June 12, 2016) – Omar Mateen committed a terrorist attack at the Pulse nightclub utilizing an automatic weapon and killed 49 civilians. Mateen was a known consumer of ISIS propaganda online and told a 911 operator during the attack that he was conducting the attack in support of ISIS and pledged his allegiance to Abu Bakr al-Baghdadi.
- *Nice, France* (July 14, 2016) – Mohamed Lahouaiej Bouhel committed a vehicle attack by driving a rental truck through a crowd of people gathered for a Bastille Day celebration in Nice, France which resulted in 86 victims. Bouhel was a known ISIS sympathizer who followed ISIS publications, such as Ramiyah, which promoted vehicle attacks.
- *Berlin, Germany* (December 19, 2016) – Anis Amri used a stolen truck to commit his attack at a Berlin Christmas market, which resulted in 12 victims. Amri was a known ISIS sympathizer who befriended ISIS supporters and a consumer of ISIS propaganda.
- *Manchester, England* (May 22, 2017) – Salman Abedi conducted a bombing attack at the Manchester Arena following a concert which resulted in 22 civilians killed. The next day, ISIS claimed credit for the attack and called Abedi a “soldier of the Khilafah.”

In addition to identifying and describing specific specific propaganda material (as the government previously disclosed), Dr. Vidino is also expected to offer the following testimony about the ISIS-sponsored publications Dabiq and Rumiyah: Both were online magazine publications issued by the Al Hayat Media Center, the official media wing of the Islamic State. Dabiq was published from July 2014, shortly after the proclamation of the Islamic State, until July 2016. In September 2016, Al Hayat began publishing Rumiyah, until approximately September 2017. In sum and substance, the two publications carried content consistent with ISIS's objectives of recruiting radical jihadists to join ISIS in Syria to build a caliphate. Over time, these publications began to include content encouraging radical jihadists to carry out attacks against non-Muslims in their home countries by various means. Each of the Rumiyah publications were found on the defendant's computer.

Very truly yours,

BREON PEACE
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Enclosure (Via Email Only)

Cc: Clerk of Court (CBA) (By ECF) (no enclosures)
Counsel of Record (By ECF)